

VLADECK, WALDMAN, ELIAS & ENGELHARD, P.C.

COUNSELORS AT LAW

1501 BROADWAY

NEW YORK, N.Y. 10036

TEL 212/403-7300

FAX 212/221-3172

SUSAN J. WALSH
COUNSELOR AT LAW



July 30, 2014

VIA ELECTRONIC MAIL

The Honorable Robert W. Sweet
United States District Court
Southern District of New York
500 Pearl St.
New York, New York 10007

Re: **U.S. v. Ryan Knights 13 Cr 795 (RWS)**

Requesting Appointment of Mentee as Associate Counsel

Dear Judge Sweet:

I am the attorney for the defendant, Ryan Knights, in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. §3006A. Mr. Knights is charged with conspiring to commit wire fraud in violation of Title 18, United States Code, Section 1343. Specifically Mr. Knights is charged with conspiring to fraudulently obtain, and assist others in fraudulently obtaining, loans from various lending institutions that were used to purchase, or refinance the purchase of, residential properties. The purpose of this letter is to respectfully request that the Court appoint Gráinne E. O'Neill, Esq., as associate counsel on behalf of the defendant, James Anderson.

As the Court may be aware, on October 23, 2008, the Board of Judges of the Southern District of New York implemented a mentorship program, which assigns experienced members of the District's CJA panel to act as mentors for attorneys interested in applying to the Panel. The program is intended to improve the diversity and overall quality of the CJA panel and is open to all interested and qualified attorneys. Many experienced state practitioners do not qualify for the Panel because they lack federal experience. The Program is designed to provide those attorneys with federal experience by pairing them with mentors and assigning them to cases that the District Court believes are of sufficient complexity to warrant the services of two attorneys. The Mentee works under the supervision of the Mentoring Attorney and is subject to the approval of the client and the District Judge to whom the case is assigned. The Mentee provides the first 15 hours on a pro bono basis, and thereafter may bill at a rate of sixty-five dollars (65)

an hour – a rate commensurate with the hourly rate of a court appointed paralegal. The District's program is the first in the Country, and will serve as a model for others around the Country.

I am one of the mentors approved by the Board of Judges. Ms. O'Neill is my mentee for the next nine months. She began her career as a Staff Attorney with the Orleans Public Defenders Office, carrying criminal cases from arraignment to plea or trial for three years. She then completed a two-year fellowship at the Charles Hamilton Houston Institute for Race and Justice at Harvard Law School. She has been in private practice for the last year and a half, and has been assigned as an associate counsel in the Southern District of New York on several cases with Susan V. Tipograph, Esq. Ms. O'Neill's resume is attached for the Court to review.

This is an excellent assignment for a Mentee since it is a complex mortgage fraud case with a tremendous amount of discovery and documents to manage in this matter. Accordingly, it is respectfully requested that the Court "So Order" that Gráinne O'Neill, Esq. is appointed as an associate counsel in the United States v. Ryan Knights, 13 Cr 795 (RWS) and that Ms. O'Neill will be permitted to bill at a rate of sixty-five dollars (\$65.00) an hour, after providing the first fifteen (15) hours of representation on a *pro bono* basis.

Your Honors understanding and consideration of this request are greatly appreciated.

Respectfully submitted,



Susan Walsh

cc: Ryan Knights
Gráinne E. O'Neill, Esq.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES

-v-

RYAN KNIGHTS

Defendant.

X

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X

13 Cr. 795 (RWS)

ORDER

Robert W. Sweet, District Judge:

Upon the application of Ryan Knights, Defendant, for an order appointing Gráinne E. O'Neill, Esq. as associate counsel, and based on the Court's independent review it is hereby:

ORDERED that Gráinne E. O'Neill, Esq. is appointed as an associate counsel in the United States v. Ryan Knights, 13 Cr. 795 (RWS) and that Ms. O'Neill will be permitted to bill at a rate of sixty-five dollars (\$65.00) an hour, after providing the first fifteen (15) hours of representation on a *pro bono* basis.

SO ORDERED

Robert W. Sweet
United States District Judge

Dated: July 30, 2014
New York, New York

GRÁINNE ELIZABETH O'NEILL

11 Park Place; Suite 914; New York, NY 10007 * 646.820.4554 * geo2102@columbia.edu

ATTORNEY ADMISSIONS

Louisiana State Bar Association (2008); New York State (2013); Southern and Eastern Districts of New York (2013)

EDUCATION

COLUMBIA UNIVERSITY SCHOOL OF LAW, New York, NY; *J.D. May 2007*

Activities: Executive Editor, Human Rights Law Review/Jailhouse Lawyers Manual; Charles Evan Hughes Fellowship; Publicity Chairperson, Civil Rights Law Society; Volunteer, Student Hurricane Network; Organizer, National Lawyers Guild

CORNELL UNIVERSITY, Ithaca, NY; *B.A. in Mathematics and Computer Science, January 1998*

Teacher's Assistant Computer Science 100

EXPERIENCE

LAW OFFICE OF SUSAN V. TIPOGRAPH

July 2013 - Present

Associate Attorney

NEW YORK, NY

Represented clients accused of felonies and misdemeanor in federal and state court, including death eligible clients, and clients charged in large conspiracies. Drafted motions for district courts, and appellate briefs for the Second Circuit. Represented clients at all stages, including appearing in a federal murder trial.

VARIOUS LAW OFFICES

January 2013 – July 2013

Consulting Attorney

NEW YORK, NY

Consultant on a variety of cyberlaw and complex criminal cases in Federal Court, and in Louisiana and New York State Courts. Provide technical assistance in parsing and organizing discovery and other documents.

CHARLES HAMILTON HOUSTON INSTITUTE AT HARVARD LAW SCHOOL

December 2010 – December 2012

Staff Attorney/Project Director

CAMBRIDGE, MA

Manage a national project that provides public defenders and capital defense attorneys with a knowledge management system for sharing motions, forensic articles, practice tips, and training videos. Develop strategies for expansion, including initiating relationships with technology experts, indigent defense experts, and forensic scientists. Oversee creation of model pleadings and information guides.

ORLEANS PUBLIC DEFENDERS

August 2007 – October 2010

Staff Attorney/Legal Services and Technology Director

NEW ORLEANS, LA

Represented clients accused of felonies and misdemeanors in magistrate, felony, and appellate courts at all stages of a case. First chaired jury and judge trials. Worked closely with a team of social workers, investigators, and experts in a holistic mode using vertical representation. Managed a caseload of 300 felony cases per year. Trained at Gideon's Promise (formerly SPDTC). Developed technology systems to provide case tracking. Oversaw all technology needs for Orleans Public Defenders. Supervised all technology contractors and initiatives. Developed and design case management system for office. Crafted solutions for interfacing with state, city, and court computer systems. Oversaw and managed all case data and implementation of reporting and systems.

PRISONERS AND FAMILIES CLINIC

Fall 2006 – Spring 2007

Legal Intern

NEW YORK, NY

Drafted Article 78 on behalf of prisoner who was denied parole based on the severity of his crime. Managed communication with client, including prison visits and letters. Determined legal strategy, including venue decisions. Managed publicity, including appearing on the radio, and organizing community supporters. Argued appeal in Appellate Court.

INNOCENCE PROJECT

Summer 2006

Law Clerk

NEW YORK, NY

Drafted motion to compel DNA testing using New York State's DNA Statute, managed legal work for clients, including communicating case status, advocating for improved conditions of confinement, and investigating the location of evidence. Celebrated client's release with family, and community.

COMMON GROUND LEGAL ADVOCACY TEAM*Spring and Summer 2006***Legal Intern**

NEW ORLEANS, LA

Researched property rights and conditions of confinement. Met with clients regarding housing, prison, and police brutality. Drafted sample FEMA appeals and Know Your Rights fliers. Coordinated Prisoners Rights Handbook.

LEGAL ACCESS WORKSHOP, WBAR*Spring 2006***Co-Host**

NEW YORK, NY

Co-hosted a weekly two hour long radio show that discussed contemporary legal issues. Structured the show, created segments, musical interludes, and interviewed practitioners, activists and policymakers.

LAWYERS ENVIRONMENTAL ACTION TEAM (LEAT)*Summer 2005***Human Rights Intern**

DAR ES SALAAM, TANZANIA

Wrote complaints on behalf of environmental activists who had been unjustly arrested for their political beliefs. Authored report on land reform in Tanzania. Drafted proposed new fisheries laws to protect local fishers from exploitation by foreign corporations.

LEGAL AID SOCIETY OF NEW YORK, PRISONERS RIGHTS PROJECT*August 2003 - March 2004***Legal Intern**

NEW YORK, NY

Conducted research and provided information to prisoners who were filing complaints, including complaints of civil rights violations in both federal and state court. Wrote advocacy letters for individual prisoners to prison superintendents and state officials requesting healthcare, safety, and freedom from harassment.

JANE DOE BOOKS*May 2003 - March 2004***Founder and Board Member**

BROOKLYN, NY

Received Village Voice 'Best of New York City' Award. Volunteer-run, community-driven women's library and resource center. Organized speakers, performers, and film showings, coordinated volunteers, networked with other local community organizations, disseminated resources and information, and developed and managed the database of books, volunteers, and mailing lists.

CITCO FUND SERVICES*October 2001 - March 2003***Sr. Programmer**

NEW YORK, NY

Developed systems for reconciling trades with prime brokerages. Managed team of programmers in Europe, the Americas and Australia. Oversaw all work and provided training, developed standards, protocols, libraries, and reusable components.

MEDIATRUCK, INC.*March 1999 - March 2001***Technical Director**

AUSTIN, TX

Led team of six developers in full product lifecycle of a J2EE-compliant web application framework using EJBs Servlets and JSPs in a strict model view controller (MVC) design pattern. Programmed in Cold Fusion, Java, ASP, Visual Basic. Presented framework at Cold Fusion Users Group Conference.

CHILDREN'S DISCOVERY CENTER*May 1998 - October 1998***Pre School Teacher**

AUSTIN, TX